

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Chapter 13
	:	
JOSE BOTERO	:	1/22/19 10:30 A.M.
	:	Courtroom # 2
	:	
	:	Case No. 18-16767

**ANSWER TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY**

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Denied. Debtor maintains auto insurance with Geico, which was active at the time this Motion was filed. Ongoing proof of insurance will be provided upon request of Movant.
6. Admitted.
7. Admitted in part, Denied in part. It is Admitted that the approximate net balance is \$46,223.61. It is Denied that debtor is in default as stated in the Motion.  
  
However, if debtor has missed any payments, they wish to enter into a stipulation allowing them to repay any post-petition arrearages and/or the loan balance through the remainder of their Chapter 13 plan.
8. Denied.
9. Denied.
10. Denied.

WHEREFORE, it is requested that this Honorable Court DENY and DISMISS movant's Motion for Relief from the Automatic Stay, or in the alternative approve a stipulation permitting the Debtors to become current on any missed post-petition payments.

Respectfully Submitted,

YOUNG, MARR & ASSOCIATES

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